

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>Bridgeport Music Inc.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 3:05-0377</b>
	)	<b>Judge Todd J. Campbell</b>
<b>vs.</b>	)	<b>Magistrate Judge Joe Brown</b>
	)	<b>Jury Demand</b>
<b>Robert Hill Music, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

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**PLAINTIFF’S MOTION FOR LEAVE  
TO FILE DOCUMENTS ELECTRONICALLY UNDER SEAL**

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Plaintiff Bridgeport Music Inc. respectfully moves this Court for an Order authorizing it to file documents under seal. Plaintiff makes this request because the following documents attached to the Plaintiff’s Response to Defendant’s Motion for Partial Summary Judgment contain confidential financial information and other confidential information from Defendant: Bridgeport’s Statement of Additional Material Facts. The documents should not be part of the public record, and are sealed attachments pending the Court’s order.

Plaintiff submits that this request is not extraordinary given the history of the Bridgeport litigation and the Court’s previous decisions to enter Orders of Confidentiality in other cases. (See 3:01-916, Doc. No. 147; 3:01-0698, Doc. No. 40; 3:01-0991, Doc. Nos. 16-17; 3:01-0992, Doc. No. 13.)

Accordingly, Plaintiff requests that the Court grant Plaintiff’s Motion for Leave to File Documents Electronically Under Seal as described above.

DATED: October 10, 2006

Respectfully submitted,

KING & BALLOW

/s/ Ramona P. DeSalvo

Richard S. Busch, BPR #14594

Ramona P. DeSalvo, BPR #18491

1100 Union Street Plaza

315 Union Street

Nashville, TN 37201

(615) 259-3456

Attorneys for Plaintiff

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing document was electronically filed and served through the Court's system, and served via ordinary U.S. Mail upon the following:

Counsel	On behalf of:
<p>Philip M. Kirkpatrick, Esq. Stewart, Estes &amp; Donnell Financial Center 424 Church Street 14th Floor Nashville, TN 37219-2392 t: (615) 244-6538 f: (615) 256-8386 Email: kirkpat@sedlaw.com</p> <p>Russell Frackman, Esq. Jeffrey Goldman, Esq. Mitchell, Silberberg &amp; Knupp, LLP 11377 West Olympic Blvd. Los Angeles, CA 90064-1683 t: (310) 312-3119 f: (310) 312-3788 E-mail: jdg@msk.com; rjf@msk.com</p>	<p>Universal-Songs of PolyGram International, Inc., individually and as successor to Songs of Polygram International, Inc.; 4th &amp; Broadway, a division of Island Def Jam Music Group, a division of Universal Music Company and UMG Recordings, Inc.; Universal Music Group, Inc., individually and as successor to Universal Records, Inc., and as successor to MCA Records, Inc.; Hip-O Records, a division of Universal Music Group, Inc.; Interscope Records, a division of Universal Music Group, Inc.; Island Def Jam Music Group, a division of Universal Music Company, and UMG Recordings, Inc.</p>

this 10<sup>th</sup> day of October 2006.

/s/ Ramona P. DeSalvo